

Ben Edward Thomas
Miller Door and Trim, Inc.
1702 East Monroe Street
Goshen, Indiana 46526

Re: **039-13595**
Second Minor Permit Modification to
Part 70 No.: T 039-7365-00155

Dear Mr. Thomas:

Miller Door and Trim, Inc. was issued a permit on September 24, 1998 for a stationary door, wood trim and furniture manufacturing plant. A letter requesting changes to this permit was received on November 2, 2000. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) surface coating booths, identified as B1 and B2, each with three (3) airless and air assisted airless spray guns. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S1, S2, S3, S4, and S5.
- (b) **One (1) automatic molding sprayer coating operation, equipped with three (3) dry filters in series, equipped with nine (9) HVLP spray applicators, exhausted through Stack F, to be installed in 2001, capacity: 3,000 liner feet of wood door trim per hour (filters do not have to be in operation at all times).**
- (cb) Woodworking Operations with a maximum rating of 1000 pounds per hour. Emissions shall be controlled by baghouse dust collector and vented to the interior of the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

~~This stationary source source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.~~ **This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):**

One (1) sanding machine, equipped with a baghouse for PM control, to be installed in 2001, capacity: 6,000 linear feet of wood door trim per hour (baghouse does not have to be in operation at all times).

SECTION D.1 FACILITY OPERATION CONDITIONS ~~Two (2) surface coating booths~~

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Operations

- (a) Two (2) surface coating booths, identified as B1 and B2, each with three (3) airless and air assisted airless spray guns. Emissions shall be controlled by dry filter, then exhausted at Stack/ Vent ID #S1, S2, S3, S4, and S5.
- (b) **One (1) automatic molding sprayer coating operation, equipped with three (3) dry filters in series, equipped with nine (9) HVLP spray applicators, exhausted through Stack F, to be installed in 2001, capacity: 3,000 liner feet of wood door trim per hour (filters do not have to be in operation at all times).**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3-2, the PM from each of the two (2) paint booths, identified as B1 and B2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the automatic molding sprayer coating operation shall not exceed 4.48 pounds per hour when operating at a process weight rate of 2,283 pounds per hour (1.14 tons per hour).**

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood ~~furniture and cabinets~~ **furnishings** shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application

Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Usage Limit

To avoid applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14 (40 CFR Part 63, Subpart JJ), the surface coating booths, identified as B-1 and B-2, **and the automatic molding sprayer coating operation** shall use no more than **one hundred (100)** gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. This limit is established in the definition of an incidental wood furniture manufacturer, pursuant to 40 CFR Part 63, Subpart JJ.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5(d)(5)]

Pursuant to 326 IAC 2-7-10.5(d)(5), the potential to emit VOC from the automatic molding sprayer coating operation is limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this VOC emission limit also makes the requirements of 326 IAC 2-2 not applicable.

D.1.5 New Source Toxics Control [326 IAC 2-4.1-1]

Any change or modification which may increase potential single and combination of HAPs emissions to 10 and 25 tons per year, respectively, from the automatic molding sprayer coating operation shall obtain prior approval from IDEM, OAM before such change may occur.

D.1.64 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **these facilities** ~~this facility~~ and any control devices.

Compliance Determination Requirements

D.1.75 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.1.1 shall be determined by performance tests conducted in accordance with Section C- Performance Testing.

D.1.86 VOC Emissions ~~Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC usage limit contained in Condition D.1.3 shall be determined through record keeping.~~ **Compliance with Conditions D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total finishing material or adhesives used in the manufacture of wood furniture or wood furniture components and the volatile organic compound usage for the month.**

Miller Door and Trim, Inc.
Goshen, Indiana
Reviewer Name: MLK/MES

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Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.97 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times **in order to comply with Condition D.1.1(a)** when the two (2) paint booths, identified as B1 and B2 are in operation.

D.1.108 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.1.119 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain on site records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be complete and sufficient to establish compliance with the usage limits established in Condition D.1.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) Monthly usage records of gallons used.
- (b) **To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.4.**
 - (1) **The amount of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (cb) To document compliance with Condition D.1.108, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activity

One (1) sanding machine, equipped with a baghouse for PM control, to be installed in 2001, capacity: 6,000 linear feet of wood door trim per hour (baghouse does not have to be in operation at all times).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sanding machine shall not exceed 4.48 pounds per hour when operating at a process weight rate of 2,283 pounds per hour (1.14 tons per hour).

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe Street, Goshen, Indiana 46526
Mailing Address: 1702 East Monroe Street, Goshen, Indiana 46526
Part 70 Permit No.: T 039-7365-00155
Facility: Automatic molding sprayer coating operation
Parameter: VOC Delivered to the Applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Miller Door and Trim, Inc.
Goshen, Indiana
Reviewer Name: MLK/MES

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All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

MLK/MES

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Miller Door and Trim, Inc.
1702 East Monroe
Goshen, Indiana 46526**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7365-00155	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 24, 1998

First Minor Permit Modification 039-10393-00155, issued March 4, 1999

First Minor Source Modification 039-12945-00155	Pages Affected: 5, 25 - 28, 30a and 35a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Second Minor Permit Modification 039-13595-00155	Pages Affected: 5, 25 - 28, 30a and 35a
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Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:
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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary door, wood trim and furniture manufacturing plant.

Responsible Official:	Mr. Ed Thomas
Source Address:	1702 East Monroe, Goshen, IN 46526
Mailing Address:	1702 East Monroe, Goshen, IN 46526
SIC Code:	2499
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD
	Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) surface coating booths, identified as B1 and B2, each with three (3) airless and air assisted airless spray guns. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S1, S2, S3, S4, and S5.
- (b) One (1) automatic molding sprayer coating operation, equipped with three (3) dry filters in series, equipped with nine (9) HVLP spray applicators, exhausted through Stack F, to be installed in 2001, capacity: 3,000 liner feet of wood door trim per hour (filters do not have to be in operation at all times).
- (c) Woodworking Operations with a maximum rating of 1000 pounds per hour. Emissions shall be controlled by baghouse dust collector and vented to the interior of the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

One (1) sanding machine, equipped with a baghouse for PM control, to be installed in 2001, capacity: 6,000 linear feet of wood door trim per hour (baghouse does not have to be in operation at all times).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection

Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Operations

- (a) Two (2) surface coating booths, identified as B1 and B2, each with three (3) airless and air assisted airless spray guns. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S1, S2, S3, S4, and S5.
- (b) One (1) automatic molding sprayer coating operation, equipped with three (3) dry filters in series, equipped with nine (9) HVLP spray applicators, exhausted through Stack F, to be installed in 2001, capacity: 3,000 liner feet of wood door trim per hour (filters do not have to be in operation at all times).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3-2, the PM from each of the two (2) paint booths, identified as B1 and B2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the automatic molding sprayer coating operation shall not exceed 4.48 pounds per hour when operating at a process weight rate of 2,283 pounds per hour (1.14 tons per hour).

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furnishings shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

Miller Door and Trim, Inc.
Goshen, Indiana
Reviewer Name: Melissa Groch

Second Minor Permit Modification
039-13595-00155
Amended by: MES

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OP No. T 039-7365-00155

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Usage Limit

To avoid applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14 (40 CFR Part 63, Subpart JJ), the surface coating booths, identified as B-1 and B-2, and the automatic molding sprayer coating operation shall use no more than one hundred (100) gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. This limit is established in the definition of an incidental wood furniture manufacturer, pursuant to 40 CFR Part 63, Subpart JJ.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5(d)(5)]

Pursuant to 326 IAC 2-7-10.5(d)(5), the potential to emit VOC from the automatic molding sprayer coating operation is limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this VOC emission limit also makes the requirements of 326 IAC 2-2 not applicable.

D.1.5 New Source Toxics Control [326 IAC 2-4.1-1]

Any change or modification which may increase potential single and combination of HAPs emissions to 10 and 25 tons per year, respectively, from the automatic molding sprayer coating operation shall obtain prior approval from IDEM, OAM before such change may occur.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.1.1 shall be determined by performance tests conducted in accordance with Section C- Performance Testing.

D.1.8 VOC Emissions

Compliance with Conditions D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total finishing material or adhesives used in the manufacture of wood furniture or wood furniture components and the volatile organic compound usage for the month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times in order to comply with Condition D.1.1(a) when the two (2) paint booths, identified as B1 and B2 are in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain on site records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be complete and sufficient to establish compliance with the usage limits established in Condition D.1.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) Monthly usage records of gallons used.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.4.
 - (1) The amount of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activity

One (1) sanding machine, equipped with a baghouse for PM control, to be installed in 2001, capacity: 6,000 linear feet of wood door trim per hour (baghouse does not have to be in operation at all times).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sanding machine shall not exceed 4.48 pounds per hour when operating at a process weight rate of 2,283 pounds per hour (1.14 tons per hour).

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe Street, Goshen, Indiana 46526
Mailing Address: 1702 East Monroe Street, Goshen, Indiana 46526
Part 70 Permit No.: T 039-7365-00155
Facility: Automatic molding sprayer coating operation
Parameter: VOC Delivered to the Applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Part 70
Minor Permit Modification**

Source Background and Description

Source Name:	Miller Door and Trim, Inc.
Source Location:	1702 East Monroe Street, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	2431
Operation Permit No.:	T 039-7365-00155
Operation Permit Issuance Date:	September 24, 1998
Minor Permit Modification No.:	039-13595-00155
Permit Reviewer:	Mark L. Kramer

The Office of Air Management (OAM) has reviewed a modification application from Miller Door and Trim, Inc. relating to the operation of a stationary door, wood trim and furniture manufacturing plant.

History

On November 2, 2000, Miller Door and Trim, Inc. submitted an application to the OAM requesting to add an automatic molding sprayer coating operation and insignificant activities to their existing plant. Miller Door and Trim, Inc. was issued a Part 70 Operating Permit on September 24, 1998. A Minor Source Modification MSM 039-12945-00155 has been proposed.

Permit Modification

Pursuant to 326 IAC 2-7-12(b), this proposed minor permit modification to the Part 70 Operating Permit, T 039-7365-00155, issued on September 24, 1998, is required to incorporate the first Minor Source Modification SSM 039-12945-00155 into the Part 70 Operating Permit. This permit modification will allow for the operation of the facilities covered in the Minor Source Modification MSM 039-12945-00155.

Conclusion

The operation of this stationary door, wood trim and furniture manufacturing plant. shall be subject to the conditions of the attached proposed Minor Permit Modification No. MPM 039-13595-00155.